



# Audit of the New London Public Schools Human Resources Office



Conducted by DeLuca Advisory Services and  
Presented in Conjunction with Shipman & Goodwin

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# Who is DLA and what is its role with NLPS?



- ▶ DeLuca Advisory Services (DLA) is an interdisciplinary team of four individuals with backgrounds in investigations, audits, accounting, and law enforcement
- ▶ At the request of Superintendent Cynthia Ritchie, in the Spring of 2019, DLA began conducting an independent audit of the New London Public Schools (NLPS) Human Resources Office (HR)
- ▶ DLA reviewed 438 personnel files of all employees hired in the past 5 years (2014-2019) who are still employed by NLPS; however ALL District employee files were reviewed for criminal background checks
- ▶ DLA's charge:
  - ▶ To evaluate the status of the contents of personnel files maintained by HR
  - ▶ To ensure that HR was following best practices
  - ▶ To determine whether the office was in compliance with applicable rules and regulations

# What methodology did DLA use in conducting its audit?

- ▶ DLA was given unfettered access to district and school-based resources and files
- ▶ DLA
  - ▶ Interviewed the HR Executive Director (employed at the time) and staff
  - ▶ Interviewed the Superintendent, principals, and other administrators
  - ▶ Reviewed employee personnel files
  - ▶ Reviewed NLPS policies and procedures
  - ▶ Researched applicable Connecticut statutes
  - ▶ Reviewed other school districts' policies and procedures as a basis for comparison
  - ▶ Consulted with legal counsel



# Findings

- ▶ The following items were consistently found in the files DLA reviewed
  - ▶ NLPS employment application
  - ▶ Transcripts
  - ▶ Resume
  - ▶ Letters of recommendation
  - ▶ Copies of government-issued identification
  
- ▶ Some files were missing one or more of the following
  - ▶ Documentation of completed criminal history checks
  - ▶ Documentation of drug screenings
  - ▶ Certificates of completion of Mandated Reporter and Sexual Harassment Training
  - ▶ Department of Children and Families ("DCF") Form 3031 (authorizing DCF to release records of investigations involving the applicant)
  - ▶ Documentation of phone calls to references



# What did the missing documentation signify?

- ▶ Missing documentation reflected a failure to maintain proof that certain procedures, checks, and trainings were completed
- ▶ Despite a significant number of missing documents do not necessarily indicate that the underlying check or training was not performed
  - ▶ Example: Certificates of completion Sexual Harassment Training were often missing from the files, but were later found at the school in which the employee worked
  - ▶ Example: Documented calls to references were rarely included in the files, but there was no indication that the calls had not been made



# Why were personnel files missing documentation?

- ▶ Over the past 10 years, there has been a high turnover rate in NLPS leadership, with 7 different Superintendents and 7 different HR Directors
- ▶ In the past, HR systems were not centralized
  - ▶ School-based administrators often maintained their own documentation and conducted their own processes
  - ▶ Certain offices, such as Adult and Continuing Education, operated independently of HR
- ▶ NLPS lacked a comprehensive and universal system for tracking the employee hiring process and maintaining personnel files
  - ▶ There was no consistent protocol for ensuring new employees met all requirements and that HR maintained completed documentation

# Were there inconsistencies in documentation across all categories of employees?

- ▶ Inconsistencies varied greatly among different categories of employee files
  - ▶ Teacher files were complete or nearly complete in 90% of the surveyed files (past 5 years)
  - ▶ Paraprofessional files accounted for the majority of missing documentation and non-compliance issues



# Significant Improvements Beginning in 2018-2019

- ▶ Superintendent Cynthia Ritchie was hired in the summer of 2018
  - ▶ Superintendent Ritchie authorized the DLA audit to identify reforms and corrective action necessary.
  - ▶ Superintendent Ritchie has led continuous improvements, taking swift action to ensure best practices in hiring and compliance with state and district requirements
- ▶ The district built and implemented new systems, structures and policies to increase and document required training for all staff
  - ▶ There was communication from central office and school administrators
  - ▶ Clear direction on how to accomplish the training



# Significant Improvements Beginning in 2018-2019

- ▶ The district became committed to ensuring compliance with all state and district mandates for new hires and current employees
  - ▶ All staff were required to complete (5) training courses during August 2019 Professional Development Days (any staff unable to complete the training at the time will complete it during the 2019-2020 year)
  - ▶ All paraprofessionals who were missing documentation of a criminal history check have been sent for fingerprints
  - ▶ All newly hired employees for the 2019-2020 School Year
    - ▶ Have completed Sexual Harassment and Mandated Reporter trainings
    - ▶ Have been sent for drug testing and fingerprinting

# Where Are We Now?

► Mandatory Reporter Training Results as of November 26, 2019

Title	Number of Employees	Number Complete	Percentage
Teachers	342	339	99%
Paraprofessional	112	112	100%
Food Service	58	58	100%
Custodians	32	32	100%
Support Staff	74	73	99%
Tutors	20	20	100%
Central Office	29	29	100%
District	667	663	99%



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# Best Practices : Proper Collection and Maintenance of Documentation

- ▶ HR now uses a comprehensive onboarding flowchart outlining steps in the process for all new hires to ensure:
  - ▶ All required state and district mandates are performed
  - ▶ All documentation is collected
- ▶ New employee files are stored in a separate area and indicate "status pending" until all processes and documentation have been completed and filed
- ▶ Personnel files are now maintained in a centralized fashion, located in the HR office
- ▶ Departments that have operated independently in the past have been advised that the central HR office will oversee all HR-related functions
- ▶ Most HR policies have been updated and approved by the Board



# NLPS' Systemic Changes and Their Impact

- ▶ New onboarding checklist and comprehensive system of creating and maintaining employee files ensure that
- ▶ Prior to their start date, all NLPS employees, regardless of classification or department
  - ▶ Will submit all application documentation (employment application, transcripts, resume, letters of recommendation, references, and copies of government-issued identification)
  - ▶ Will submit to criminal history checks, fingerprinting, drug screening, and DCF registry search
  - ▶ New procedures for addressing criminal records uncovered during fingerprint check
  - ▶ Will complete Mandated Reporter, Sexual Harassment, and Human Trafficking Training
  - ▶ Will have personnel files with all required documentation

# Further Considerations

- ▶ Increase security for the personnel file room
- ▶ Implement the already purchased electronic system for HR files in which files that are checked out can be easily located
- ▶ Utilize an electronic (rather than ink) fingerprinting system to reduce number of prints rejected due to poor quality and make process more efficient
- ▶ Create a Compliance Specialist position to oversee background checks and ensure fingerprint checks are returned and filed
- ▶ Develop procedures for district response to positive drug tests
- ▶ Document all follow-up actions in the personnel file
- ▶ Implement district-wide use of a common reference check form (to be stored in personnel file) to document phone calls to references
- ▶ Require substitutes to follow same background checks and protocols as teachers